

Applicant: Ilkka Naatti et al.
Application No.: 10/561,401
Response to Office action dated Jul. 16, 2008
Response filed August 25, 2008

Remarks

Claims 34–51 remain pending in the application. In the Office action dated Jul. 16, 2008, the drawings were objected to as not showing the "vertical and machine direction mounting". Claims 34, 37–38, 42, 44–45, and 47 were rejected as anticipated by Kinnunen et al. Claims 35–36 and 39–40 were rejected as obvious over Kinnunen et al. in view of Saukkonen; claims 41 and 46 were rejected as obvious over Kinnunen et al. in view of Kojo et al.; claims 43 and 49–51 were rejected as obvious over Kinnunen et al. in view of Willer et al.; and claim 48 was rejected as obvious over Kinnunen et al. in view of Junk.

A new drawing, FIG. 12, has been added setting forth the arrangement described in the second sentence in paragraph [0032].

Claim 36 has been amended to correct a typographical error in the spelling of "central". Claim 50 has been amended to depend from claim 49.

The examiner has read the roll 21 of Kinnunen et al. on the first guide roll as set forth in claims 34 and 44. Applicant has amended claims 34 and 44 to more clearly define the first roll in claim 34 as "*the roll which first comes in to nipping engagement with the reel spool*" and in claim 44 as "*arranged so as to engage the paper reel ... before any other roll... and... to begin the reeling of the paper web*". Further, claim 34 has been amended to clarify reeling is preformed in both the primary reeling station and the secondary reeling station, whereas in Kinnunen et al reeling is performed only in a single station.

Saukkonen is a very different kind of reel than applicant's claimed invention, in that the rolls 18, 19 and the related structures of Saukkonen simply support the forming machine reel but do not engage the machine reel at the point the web is first brought to the reel, therefore they cannot affect the nip load where the web joins the machine reel. As a simple one-to-one substitution of structure, there is a complete lack of any KSR type substitution of similar things, and there is a complete lack of a rationally articulated reason of how Saukkonen renders applicant's claimed invention obvious. A claimed invention is not made obvious by a collage of the prior art, but rather prior art references must be shown to make obvious to the mind of the person of ordinary skill, doing what applicant has done. That is,

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an invalidating set of references is more like a puzzle where the pieces interconnect. A dissimilar device may solve a similar problem, and so be relevant in teaching how a known problem can be solved as set forth in claims, but a carefully reasoned explanation is needed of how the problem present in the prior art is addressed by the secondary reference and so therefore the references collectively teaches the claimed combination.

Kojo et al. again teaches an unrelated reel-up which does not employ an endless loop which engages the machine reel. That rolls can be made to move independently is hardly of interest if how they can be made to move independently in the context of being inside an endless loop is nowhere even hinted at. Similarly, that a roll might be mounted for motion in two axes is hardly of interest in any way particularly relevant to the claimed structure. The examiner statement that “motivation for the combination would be to position of the guide rolls and adjust the tension in the support member (F)” is no more than a statement of the functionality of the claimed element. If a bolt is claimed it will certainly have the functionality of a bolt, but a prior art reference showing a bolt does not logically make the use of a bolt in an apparatus obvious.

With Möller et al. the examiner finds a disclosed arrangement of rolls and a belt (i.e., “the bolt”) to provide the reason for combination “to provide ... [an] extra guide roll for the web before the web is reeled to the spool (11) and first guide roll (21)”; yet this arrangement is not taught by Möller et al. or by Kinnunen et al., but rather only by applicant’s disclosure.

Junk teaches vertical rails but not in the claimed structure and provides no reason for combination.

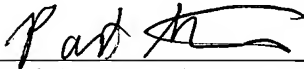
Applicant has distinguished over the applied art by more clearly defining the first guide roll so it cannot be read on the guide roll 21 of Kinnunen et al.

Applicant believes that no new matter has been added by this amendment.

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Applicant submits that the claims, as amended, are in condition for allowance.
Favorable action thereon is respectfully solicited.

Respectfully submitted,



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